

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

APR 27 2018

David J. Bradley, Clerk

United States of America

v.

Bobby ALANIZ

DOB: 1979

Case No.

M-18-0904-M

Defendant(s)

SEALED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/13/2017 - 4/12/2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 846

21 USC 841

Conspiracy to Possess with the Intent to Distribute and
Possession with Intent to Distribute Cocaine, approximately 660
grams, a schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by AUSA D. PAXTON
DPP — 4/27/18



Complainant's signature

Joshua Wedesky - ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 28, 2018 4:28pm



Judge's signature

City and state:

McAllen, Texas

U.S. Magistrate Peter Ormsby

Printed name and title

ATTACHMENT A

On or about December 13, 2017, a Cooperating Source (hereinafter referred to as CS) purchased approximately 28 grams of suspected cocaine from ALANIZ. Prior to the narcotics transaction, CS placed a phone call to ALANIZ to set up the narcotics transaction. Law enforcement officers observed ALANIZ arrive at the Valley EZ Mart Store located at 914 W. Sam Houston Boulevard, San Juan, Texas 78589 driving a blue, 1996 Chevrolet Silverado (License Plate: FVK3424). CS conducted the narcotics transaction in the vehicle driven by ALANIZ in the parking lot of the Valley EZ Mart store. The approximate 28 grams of suspected cocaine was tested by the Texas DPS Laboratory, the substance tested positive for cocaine.

On or about February 7, 2018, CS purchased approximately 125 grams of suspected cocaine from ALANIZ. Prior to the narcotics transaction, CS placed a phone call to ALANIZ to set up the narcotics transaction. Law enforcement officers observed ALANIZ arrive at the Valley EZ Mart Store located at 914 W. Sam Houston Boulevard, San Juan, Texas 78589 in a maroon, Mercury Grand Marquis (License Plate: CXH8690). CS conducted the narcotics transaction in the vehicle driven by ALANIZ in the parking lot of the Valley EZ Mart store. The approximate 125 grams of suspected cocaine was tested by the Texas DPS Laboratory, the substance tested positive for cocaine.

On or about March 1, 2018, CS purchased approximately 125 grams of suspected cocaine from ALANIZ. Prior to the narcotics transaction, CS placed a phone call to ALANIZ to set up the transaction. Law enforcement officers observed ALANIZ arrive at the Valley EZ Mart Store located at 914 W. Sam Houston Boulevard, San Juan, Texas 78589 in a white, 2015 GMC Acadia with a Texas temporary license plate listed as "03B8656" (hereinafter referred to as TARGET VEHICLE). The transaction took place inside the vehicle of CS. The approximate 125 grams of

ATTACHMENT A

suspected cocaine was tested by the Texas DPS Laboratory, the substance tested positive for cocaine.

On or about March 20, 2018, CS purchased approximately 127 grams of suspected cocaine from ALANIZ. Prior to narcotics transaction, CS placed a phone call to ALANIZ to set up the transaction. ALANIZ agreed to meet CS at a Taco Bell restaurant located at 101 East Nolana Loop, Pharr, TX 78577. On this date, the narcotics transaction took place inside the TARGET VEHICLE.

On or about April 3, 2018, CS purchased approximately 127 grams of suspected cocaine from ALANIZ. Prior to narcotics transaction, CS placed a phone call to ALANIZ to set up the transaction. Later on that same date, but also prior to the transaction, agents were advised that by a Texas DPS-CID agent that ALANIZ had advised CS to meet ALANIZ at the Walgreen's located at 824 N. Veterans Boulevard in San Juan, Texas. On this date, the narcotics transaction took place inside the TARGET VEHICLE.

ATTACHMENT A

On or about April 12, 2018, CS purchased approximately 128 grams of suspected cocaine from ALANIZ. Prior to narcotics transaction, CS placed a phone call to ALANIZ to set up the transaction. Law enforcement officers observed ALANIZ leave his residence and arrive at the Valley EZ Mart Store located at 914 W. Sam Houston Boulevard, San Juan, Texas 78589 in the TARGET VEHICLE. On this date, the narcotics transaction took place inside the TARGET VEHICLE.

Joshua Wedesky - ATF Special Agent

Sworn to before me and subscribed in my presence,

U.S. Magistrate Peter Ormsby

April 17, 2018